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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMMED HONARI  
Defendant.

Case No. 2:19-cr-00300-JCM-EJY

**Stipulation to Continue Sentencing  
Date and Motion for Good Cause to  
Extend the Time Allotted for the  
Sentencing Hearing**

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Daniel Hill, counsel for Defendant Mohammed Honari (hereinafter, the Defendant), that the sentencing hearing currently scheduled for September 13, 2023, at 10:00 a.m. be vacated and continued until a time convenient to the Court but no sooner than thirty (30) days.

1 This Stipulation is entered into for the following reasons:

2 1. The undersigned is engaged in a jury trial before the Honorable Judge Kent J.  
3 Dawson that commences on Monday, September 11, 2023 in *United States v. David Litwin*,  
4 11-cr-00347-KJD. The trial is expected to last at least two weeks.

5 2. In addition, the agent for the US Secret Service who will testify as to the proper  
6 restitution and loss amount is unavailable, as he is on protection detail for the United Nations  
7 General Assembly.

8 3. Defendant is out of custody and does not object to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay.

10 5. Both the restitution amount and the loss amount, pursuant to the plea  
11 agreement, will be disputed. Honari will be requesting a loss amount of \$40,000. The  
12 Government will be seeking a loss amount greater than \$250,000. The Government must  
13 prove the loss amount by a preponderance of the evidence. This will require the testimony  
14 of cooperating witnesses and a US Secret Service agent, who Honari will have the right to  
15 cross examine. Therefore, there is good cause to extend the sentencing hearing beyond one  
16 hour, as Honari has a constitutional right to confront the Government's witnesses at his  
17 sentencing hearing.

18 WHEREFORE, the United States of America, and the Defendants jointly request  
19 that the trial date in this matter be continued for at least 30 days.  
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21  
22  
23  
24

1 DATED this 5th day of September, 2023.

2 For the United States of America:

3 JASON M. FRIERSON  
4 United States Attorney

5 /s/ Edward G. Veronda  
6 Edward G. Veronda  
Assistant United States Attorney

For the Defendants:

/s/ Daniel Hill  
Daniel Hill, Esq.  
Counsel for Mohammad Honari

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MOHAMMED HONARI, et. al

7 Defendants

Case No. 2:19-cr-00300-JCM-EJY

**ORDER**

8  
9 Based upon the pending Stipulation, the Court finds that:

10 1. Government's counsel and the US Secret Service agent are unavailable for the  
11 scheduled sentencing hearing on September 13, 2023.

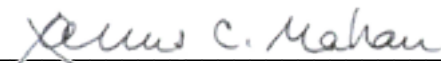
12 2. The additional time requested herein is not sought for purposes of delay.

13 For all of the above stated reasons, the ends of justice would be best served by a  
14 continuance.

15 3. In addition, there is good cause for the sentencing hearing to be scheduled greater  
16 than one hour as the Government will be calling witnesses to prove the loss  
17 amount, pursuant to the plea agreement Honari entered into.

18 IT IS THEREFORE ORDERED that the sentencing hearing for September 13, 2023  
19 at 10:00 a.m., be vacated and continued to **October 13, 2023, from 10:00 a.m. to 11:30**  
20 **a.m.**

21 DATED September 6, 2023.

22  
23   
24 JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE